

1. Executive snapshot

Item	Tunisia assessment
Best-fit sectors	Type I: hospitals, universities, public facilities and hotels. Type II: agro-food cold chain, fisheries, dairy, fruit and pharmaceutical cold chain.
Ease of importing from Europe	EU-origin industrial HVAC&R equipment, provided EUR.1 origin documentation is correct.
Regulatory clarity	CE/EN/ISO are broadly accepted in practice, but room ACs ≤12 kW require ANME energy labelling.
Main opportunity	Growing cooling demand in healthcare, hospitality, public buildings and cold chain, combined with zero-duty EU import access and ANME energy-efficiency programmes.
Primary barrier	Mandatory ANME energy label for room ACs ≤12 kW, 19% VAT on imports, no automatic donor-project exemption, and uneven local O&M capacity outside main cities.
Best-fit technologies	Chillers, cold rooms, commercial refrigeration, heat pumps, hospital HVAC, PV-hybrid cooling, smart controls, monitoring, passive cooling and retrofit packages.
Recommended EPIC approach	Prioritise commercial and industrial applications above 12 kW where possible; require named Tunisian service partners, spare-parts plans, and pre-clearance of ANME labelling where room ACs are included.

2. Market demand and commercial opportunity

Tunisia has a fast-growing cooling market driven by rising temperatures, summer peak electricity demand, hospitality, healthcare, public buildings and agro-food cold-chain needs. Air conditioning is a major contributor to summer electricity peaks: STEG recorded a 2021 peak demand of 4,472 MW and estimated that 44% was due to air conditioners. By September 2022 that record had already been broken: Tunisia recorded a new peak of 4,677 MW

on 8 September 2022, again attributed to air conditioning use, and STEG forecast the 2023 summer peak to reach 4,700-4,900 MW as temperatures and AC ownership continue to rise. This structural pressure on the grid explains why ANME has made AC energy efficiency a sustained policy priority, and why STEG is actively modelling climate-linked peak demand scenarios to guide its investment planning.

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The AC market itself remains characterised by a significant compliance gap. Most commercial brands of air conditioners in Tunisia are not energy certified, and energy-inefficient units enter the market through smuggling networks and parallel distribution channels, sold at low prices without meeting national standards.

Type I – Healthcare and public buildings

Vaccine and pharmaceutical cold chain reliability is a recognised gap across the MENA region, and Tunisia's healthcare system with a network of public hospitals across all governorates and a substantial private clinic sector concentrated in Tunis, Sfax and Sousse requires dependable, monitored refrigeration for medicines and biological products. Tunisia's power sector does not possess excess generation capacity and is susceptible to brownouts, making power-resilient cooling with reliable backup particularly relevant for healthcare applications. Public buildings and schools offer retrofit opportunities for passive cooling, efficient HVAC and smart controls, particularly under ANME's ongoing energy efficiency programmes.

Type II – Agro-food, cold chain, hospitality

Agriculture employs 15% of Tunisia's workforce and is an important source of exports and foreign

currency, with olive oil and dates dominating the export. FAO's energy programme with the Food Security Package SEMED assessed the potential of cold chain to reduce food loss and waste in Tunisia's potato and tomato value chains, and identified substantial losses that better refrigeration infrastructure could prevent. Beyond olive oil, Tunisia's fisheries, dairy and fruit and vegetable sectors also face significant cold-chain losses. Tunisia has a developed fishing industry centred on the Gulf of Gabes and Bizerte, and an active vegetable and fruit export sector supplying European markets. FAO estimates that post-harvest losses for fruit and vegetables can reach up to 40%, creating a strong investment case for pre-cooling, cold room and refrigerated transport solutions across the value chain. The hospitality sector adds a third layer of near-term demand. Much of the hotel stock was built in 1980s and 1990s creating demand for energy-efficient cooling, chiller upgrades and building management systems.

Purchasing remains price-sensitive, especially among SMEs, but buyers in healthcare, hospitality and cold chain value durability, spare-parts availability, serviceability and warranties. Significant market opportunities exist for goods and services supporting local agriculture and the agro-processing industry, and the 2016 Investment Law includes up to 50% tax incentives to encourage acquisition of

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agricultural equipment. European companies should offer extended warranty terms backed by a named Tunisian service partner, and provide ANME-compliant technical and energy documentation from the start.

Priority segment	Opportunity
Healthcare	Hospital HVAC, vaccine and pharmaceutical cold chain, reliable cooling with high service requirements.
Agro-food and fisheries	Cold rooms, pre-cooling, dairy, fruit, fish processing, storage and logistics.
Hospitality	Hotels in Tunis, Sousse and Djerba; stronger willingness to consider EU-standard equipment and lifecycle cost.
Public buildings and education	Retrofit, passive cooling, efficient HVAC and smart-control demonstrations.

3. Import and regulatory matrix by EPIC application

EPIC track	Application / equipment package	Import duty from EU	Certification / standards issue
Type I - Tertiary	Passive cooling / building retrofit: insulation, shading, reflective surfaces, ventilation components	Likely 0% if EU-origin and industrial goods qualify	Building thermal regulation may apply; check ANME/RTB requirements
Type I - Tertiary	Room ACs / split ACs / small packaged systems ≤12 kW	0% with EUR.1 if EU-origin	ANME energy label mandatory; CETIME testing + ANME approval; only classes 1-3 permitted
Type I - Tertiary	Chillers, heat pumps, large HVAC systems >12 kW	0% with EUR.1 if EU-origin	CE accepted in practice; no mandatory Tunisian MEPS/product registration currently for commercial/industrial equipment >12 kW
Type I / II	Smart controls, BMS, sensors, meters, monitoring	0% with EUR.1 if EU-origin	Electrical conformity; telecom checks if wireless
Type I / II	PV-hybrid cooling and resilience package	Confirm by HS code and programme eligibility	Electrical and STEG connection requirements

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EPIC track	Application / equipment package	Import duty from EU	Certification / standards issue
Type II - Cold chain	Pre-cooling equipment: forced-air, hydro-cooling, ice machines, heat exchangers	0% with EUR.1 if EU-origin	CE accepted in practice; food/water-contact aspects may need site-specific review
Type II - Cold chain	Cold storage: cold rooms, evaporators, condensers, commercial refrigerators/freezers	0% with EUR.1 if EU-origin	No mandatory MEPS for commercial/industrial cold rooms currently; confirm if packaged appliance falls under labelling rules
Type II - Industrial refrigeration	Compressors, condensers, evaporators, valves, pressure equipment, controls	0% with EUR.1 if EU-origin	CE, pressure/electrical documentation; refrigerant safety requirements
Type II - Refrigerated transport	Transport refrigeration units, reefer bodies, loggers	Depends if equipment-only or complete vehicle	Vehicle/import rules may apply if full reefer vehicle is imported

Budgeting assumption: for EU/European-origin HVAC&R equipment, assume 0% customs duty with EUR.1, plus 19% VAT, port/customs costs, and any product-specific testing or certification costs. A practical landed-cost estimate for EU-origin equipment is around 19-22% above CIF, but this should be confirmed by HS code before procurement.

4. Standards, certification and key authorities

For most industrial HVAC&R equipment, CE marking and EN/ISO technical files are accepted in practice, and INNORPI generally adopts EN/ISO standards where Tunisian NT standards do not exist. However, Tunisia and the EU do not have an ACAA, so CE acceptance is based on administrative practice rather than a binding mutual-recognition agreement.

The main exception is room ACs ≤ 12 kW, which require the ANME energy label. The label is bilingual French/Arabic, uses an eight-class system, and since 2012 only classes 1, 2 and 3 have been allowed on the Tunisian market. CE marking does not substitute for the ANME label.

Authority / body	Role
ANME	Energy labelling, energy-efficiency programmes, FNME fund.
CETIME	Testing laboratory for ANME energy labels, especially room ACs <=12 kW.
INNORPI	National standards body; EN/ISO adoption and Tunisian standards.
TUNAC	Accreditation of laboratories and conformity assessment bodies.
Douane Tunisienne / Tunisia Trade Net	Customs tariffs, import processing, HS code verification.
Ministry of Environment / National Ozone Unit	HCFC import notifications and Montreal Protocol obligations.
STEG	Electrical installation approval and grid connection; NF C 15-100 used as de facto standard.

5. Import documents, timelines and exemptions

Core documents for import and conformity:

- commercial invoice in French, with CIF value and HS codes;
- packing list;
- bill of lading or airway bill;
- EUR.1 Movement Certificate or valid invoice declaration for EU-origin duty-free treatment;
- CE Declaration of Conformity;
- technical datasheet with model, cooling capacity, refrigerant type and charge, and power data;
- ANME energy label certificate for room ACs <=12 kW;
- customs declaration D.16 filed by a Tunisian customs agent;
- importer customs code and tax ID;
- refrigerant import notification for HCFCs, where applicable;
- pressure vessel or electrical documentation, where applicable.

Timelines: standard customs clearance can take 3-10 working days when documentation is complete. For first-time room AC models requiring the ANME label, applicants should allow around 10-14 weeks in total, including CETIME testing and ANME approval. Repeat imports of already certified models are faster.

Exemptions: no automatic VAT or customs exemption should be assumed for donor-funded EPIC projects. The most relevant support mechanism is the FNME, which provides financial support for energy-efficiency actions, audits, demonstration projects and certain equipment investments. Tax benefits may be available for equipment used for energy management where no locally manufactured equivalent exists, but this requires ANME confirmation. EPIC should clarify with the Ministry of Finance and ANME whether specific donor-funded pilots can receive VAT suspension, customs relief or FNME co-financing.

6. Local content, partnerships and O&M

There are no statutory local-content thresholds for importing HVAC&R equipment. However, public procurement rules and practical implementation needs create strong incentives to partner locally. Foreign companies can bid on Tunisian public tenders, but an import declaration normally requires a Tunisian-registered entity or licensed importer-of-record service, and public procurement criteria may favour Tunisian-origin products or SME participation.

For EPIC, a local partner should be treated as essential in practice, even if not always legally mandatory. The strongest proposals should include:

- a Tunisian HVAC&R distributor, EPC contractor or authorised service firm;
- named locally based technicians;
- a spare-parts plan;
- French and Arabic O&M documentation;
- a preventive maintenance contract;
- training by the manufacturer, CETIME or an ANME-linked provider.

Local capacity exists, particularly in Tunis, Sfax and Sousse, but is weaker in interior and rural areas. The largest technical gap is for A2L and natural refrigerant handling, including R-32, R-454B, R-290 and CO2 applications. European technicians may support commissioning, but they cannot substitute for local long-term maintenance capacity.

7. Refrigerants and technology choice

HFCs are currently permitted and Tunisia does not operate an EU-style F-gas quota system. HCFC-22 is being phased out under Montreal Protocol obligations, and HCFC imports require notification through the National Ozone Unit. Tunisia has ratified the Kigali Amendment, with HFC reduction obligations expected to become more binding in the early 2030s.

The main issues are around availability of refrigerants, technician competence, safety tools and maintenance capacity. R-32 is likely to be appropriate for split ACs where ANME-compliant models are available. For commercial and industrial systems, R-32, R-454B or CO2 may be suitable depending on application, but only where local O&M capacity is demonstrated.

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